

Patricia C. O'Prey  
SCHOEMAN UPDIKE KAUFMAN & GERBER LLP  
551 Fifth Avenue  
New York, NY 10176  
(212) 661-5030  
*Attorneys for Gleam Holdings, Inc.*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

LUIGI ABREU, Individually, and On Behalf of  
All Others Similarly Situated,

Index No.: 1:22-cv-1331-CM

Plaintiff,

- against-

**NOTICE OF MOTION**

GLEAM HOLDINGS, INC.,

Defendant.

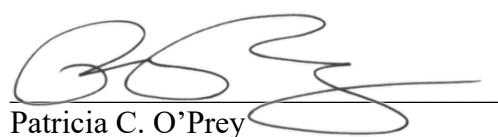
-----X

PLEASE TAKE NOTICE that upon the annexed declaration of Melanie Mills, executed on April 28, 2022 and the accompanying memorandum of law, and the prior pleadings and proceedings herein, defendant Gleam Holdings, Inc. shall move this Court, before Hon. Colleen McMahon, United States District Court Judge, at the United States Court House at 500 Pearl Street, New York, New York 10007, on a date and at a time to be set by the Court, for an order as follows:  
(i) dismissing Plaintiff's complaint pursuant to Fed. R. Civ. P. 12(b)(1), (2) & (6) for lack of standing, lack of personal jurisdiction and failure to state a claim; and (ii) granting such other and further relief as the Court deems just and proper.

Dated: April 29, 2022

SCHOEMAN UPDIKE KAUFMAN &  
GERBER LLP

By:

  
Patricia C. O'Prey  
551 Fifth Ave  
New York, NY 10176  
[poprey@schoeman.com](mailto:poprey@schoeman.com)  
(212) 661-5030  
*Attorneys for Defendant Gleam Holdings, Inc.*